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## MINORITY MEDIA AND TELECOMMUNICATIONS COUNCIL

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ORIGINAL

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HECEIVED

March 3, 2002

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Hon. Marlene Dortch Secretary Federal Communications Commission 445 12th Street S.W. Washington, D.C. 20554

PEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Dortch:

RE: MB Docket No. 02-277 (Biennial Review of Broadcast Ownership Rules)

MM Docket No. 01-235 (Broadcast/Newspaper Crossownership)

MM Docket No. 01-317 (Local Radio Ownership)

MM Docket No. 00-240 (Definition of Radio Markets)

Pursuant to 47 CFR §1.1206, this will disclose that in connection with these permit-but-disclose proceedings, on behalf of the Diversity and Competition Supporters (MMTC et al.) I held a meeting February 28, 2003 at 1:30 PM with Commissioner Copps and his Legal Advisor, Alexis Johns.

At the meeting, I promised copies of our Initial Comments, Supplemental Comments, Reply Comments, and the Statement of National urban League President Hugh Price, all of which are in the record.

I described how our "Staged Implementation Plan" (described in our Comments and Reply Comments) might operate in practice as a means of ensuring that if deregulation causes harm to competition, diversity, minority ownership or localism, the Commission could apply the brakes until it cures the problem.

I also explained the "equal transactional opportunity" policy described in our Initial Comments.

I drew attention to the Communications Workers of America proposal to replace  $L^{MAS}$  with newspaper-type joint operating agreements (JOAs), and noted that we have endorsed this idea.

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Finally, I explained our proposal for Diversity Credits as a market mechanism to incentivize diversity. If the plan were designed well, most "command and control" regulation would be unnecessary.

An original and two copies of this letter are being filed with the Secretary.

Sincerely,

/ S /

David Honig Executive Director

cc: Hon. Michael Copps Alexis Johns, Esq.

Alexis Johns, Esq. Wanda Hardy (with floppy disk)

Qualex International (with floppy disk)

/dh